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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NORMAN BUETOW, et al.

Defendants.

No. CR 09-01119 JW

STIPULATION AND ~~PROPOSED~~
DISCOVERY PROTECTIVE ORDER
BETWEEN THE UNITED STATES AND
ALL DEFENDANTS

Defendants Norman Buetow, Tony A. Yaymadzhyan, Susan Nahapetian, and Rudik Avakyan, and the United States of America, by and through their counsel of records, hereby agree and stipulate as follows:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory powers.
2. This Order pertains to all discovery provided to or made available to defense counsel as part of discovery in the above-cited case.
3. The discovery and information therein may only be used in connection with the litigation of this case and for no other purpose. Defense counsel will return the discovery to the

government, or certify that has been shredded at the conclusion of the case.

1 4. Defense counsel shall not provide any of the discovery to any person other than
2 to their respective defendant/client, or attorneys, law clerks, paralegals, secretaries, experts and
3 investigators involved in the representation of his or her defendant/client, for the purpose of said
4 representation. Further, in disclosing discovery to defendants, personal information contained in
5 the discovery, including individuals' dates of birth, addresses (physical and email), telephone
6 numbers, social security numbers, and driver's license numbers, shall be redacted, and shall not
7 be provided to any defendant in any manner or form.

8 5. Defense counsel shall advise his or her respective defendant/client, employees,
9 other authorized members of the defense team and defense witnesses of the terms of this
10 stipulation and order, and that use of the subject discovery materials for a purpose other than in
11 connection with the litigation of this case may be subject to criminal sanctions.

12 6. Defense counsel will store the discovery in a secure place and will exercise due
13 diligence to ensure that it is not disclosed to third persons in violation of this agreement.
14 Similarly, if defense counsel make, or cause to be made, copies of any of the discovery, defense
15 counsel will exercise due diligence to maintain control of said copies and to ensure that said
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copies are stored in a manner to safeguard against the inappropriate use of said materials.

DATED: March 2, 2010

JOSEPH P. RUSSONIELLO
United States Attorney

/s/
EUMI L. CHOI
Assistant United States Attorney

/s/
FRED MINASSIAN, ESQ.
Attorney for Defendant Tony A. Yaymadzhyan

/s/
PAUL B. MELTZER, ESQ.
Attorney for Defendant Norman Buetow

/s/
GEORGE GEVORK MGDESYAN, ESQ.
Attorney for Defendant Susan Nahapetian

/s/
JOHN STANLEY, ESQ.
Attorney for Defendant Rudik Avakyan

ORDER

Based upon the stipulation of the parties, and for good cause shown, the Court
HEREBY ORDERS that the terms of the stipulation between the United States and all
defendants in this case pertaining to the discovery in this case be imposed.
IT IS SO ORDERED.

DATED: *March 5, 2010*


PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE